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July 18, 2025

ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-131

Re: *Cynthia Herrick et al. v. Shutterstock, Inc.*, 1:23-cv-03191-JPC

Dear Magistrate Judge Cave:

Pursuant to the Court's May 29, 2025 Order (Dkt. 83), Plaintiff Cynthia Herrick ("Plaintiff"), on behalf of herself and all others similarly situated, and Defendant Shutterstock, Inc. ("Shutterstock, and together with Plaintiff, the "Parties") submit this joint letter to certify that, subject to the exceptions below, fact discovery has been completed.

The outstanding discovery items are:

- Defendant's Responses and Objections to Plaintiff's Second Set of Interrogatories, which are due on August 8, 2025;
- Responses to two third-party subpoenas served by Defendant; and
- Plaintiff's Responses and Objections to Defendant's Supplemental Third Set of Interrogatories, which are due on August 17, 2025.

Respectfully submitted.

/s/ James Rosenfeld

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/s/ Thomas C. Bright

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Cc: Counsel of record via ECF